

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

**ADMINISTRATIVE RESPONSE TO
MOVANT'S MOTION TO LIFT THE AUTOMATIC BANKRUPTCY STAY**

No. 4:10-bk-06239-JMM
Chapter 7

RE: Real Property Located at
4976 East Garrison Court
Tucson, AZ 85712

Pursuant to the agreement evidenced by the private proprietary records sent to the Judge in camera to protect the interests of the paramount security interest holder, the authorized representatives for LYDIA R BAÑUELOS and NAZANIN N MEFTAH, hereafter 'Respondents', conditionally accept Movant's motion for relief of stay upon proof of claims that:

- (a) Movant has filed a B-10 showing a valid interest and valid claim;
- (b) Movant has status, in any form, to bring the "Motion to Lift Automatic Bankruptcy Stay" against Respondents;
- (c) Movant and Bankruptcy Estate are not adequately protected;
- (d) Movant did not receive "Nice Offer and Demands" from Respondents (Exhibit A) via registered mail on June 23, 2010.
- (e) Movant's attorney did not receive a response via fax correspondence on June 29, 2010 (Exhibit B) in timely response to Movant's 5-day notice.

Additionally, Respondent hereby moves to:

- I. Have records reviewed in camera.
- II. Have the stay remain in force pursuant to Respondents' Petition for injunctive and other relief and for the Superior Court to compel Movant to produce and comply with Respondent's demands.

DATED this 19th day of July, 2010.

Respectfully submitted,


LYDIA R BAÑUELOS
Authorized Representative


NAZANIN N MEFTAH
Authorized Representative